CITY OF LAS VEGAS

ADA SELF-EVALUATION
January 26, 1993

Executive Summary

An evaluation of all current City of Las Vegas services, policies and practices and the effects thereof was made as directed by Federal Regulation 28 C.F.R. part 35 implementing Subtitle A of Title II of the Americans with Disabilities Acts, Pub.L. 101-336. This self-evaluation was to identify and correct any services, policies or practices that were not consistent with the requirements of Title II of the ADA.

A self-evaluation checklist was developed based on The ADA Self-Evaluation: A Handbook For Compliance With The Americans with Disabilities Act by Parks and Recreation Agencies, published by the National Recreation and Parks Association, Resource Development Division.

Each department appointed one or more persons to a City ADA Task Force. Task force members were trained by the ADA program administrator on ADA, including concepts, accessibility and the intent and spirit of the law. Task force members provided training to department and division staff and coordinated completion of the self-evaluation checklists during October, 1992. A total of 80 checklists were completed on major programs and services as identified by the Departments.

Areas surveyed were Administration, Communications, Governance and Meetings, Training, Program Planning, Transportation, Emergency Evacuation, Volunteers, and Playgrounds and Parks.

Administration included program fees, contracts for service, assignment of employees, procedural requirements, performance reviews and undue burden. No deficiencies were identified in the areas of program fees or assignment of employees. At the time of the survey, 25% of the programs and services provided still needed to develop a policy of intent to comply with the ADA.

Communications considered telephones, brochures, annual reports and publications, invitations to bid, board minutes, freedom of information requests, and correspondence. The Graphic Arts Division began including the City TDD number on everything that has a City telephone number. The Purchasing and Contracts Division, working with the ADA program administrator, arranged for Braille documents and sign language interpreters to be available as needed and developed a list of assistive listening device providers. The Training and Development Division has an ADA component in their Academy program. At the time of the survey, a number of the programs needed to: state that upon request, printed materials, including minutes of boards and/or committees, were available in an alternative format; provide receptionists with information regarding which facilities are accessible and who to contact for further information; institute periodic anonymous self-evaluation phone calls to audit employee's responses to requests for auxiliary aids and services and accommodations; develop other ways to convey bulletin board or marquee information; and attempt to write department documents and publications in easier-to-understand language.

Governance and meetings included board meeting announcements, public comment, and availability of agendas, locations and cable broadcasts. About a third of the programs and services needed to offer to provide, upon request, an auxiliary aid or service or accommodation at public meetings, upon request; to have an audio-tape of each meeting agenda available and to develop a policy of asking people attending a City hosted meeting if any accommodations are needed.

Training looked at new employee orientation, regular in-service opportunities, professional development and continuing education, seasonal employee training and elected officials. Training and Development Division incorporated the findings from the self-evaluation into their ADA component. At the time of the survey, 41% of the programs and services needed to develop and schedule opportunities for individuals with disabilities who use programs and facilities to provide evaluative feedback.

Program planning and delivery included most integrated settings, changing rules and procedures, removing architectural barriers, removing transportation barriers and staff training. No deficiencies were identified in accepting qualified persons as participants or in making requested adaptations.

Four departments reported they provided **transportation** for participants. At the time of the survey, half did not have access to a vehicle which would seat individuals who use wheelchairs.

Although most facilities have an **emergency evacuation** plan in place, almost two-thirds needed to post the evacuation route for the facility or work area in large print.

The **volunteer** application was rewritten to remove questions about medical condition or history prior to an offer of volunteer service position. No deficiencies were identified in the use and recognition of volunteers.

Playgrounds and parks had no deficiencies in willingness to modify existing areas for use by persons with disabilities or to change rules or policies to enable use by persons with disabilities. The lack of accessible play experiences in all existing playgrounds and parks is addressed in the Department of Parks & Leisure Activities' five year capital improvement plan.

Some deficiencies were corrected as soon as they were identified. Remaining deficiencies were discussed with the Department Director or designee and the Division Chief to develop consensus or resolution. The Department/Divisions have been asked to inform ADA program administration when the deficiency is resolved. **ADA program administrator will monitor progress at six month intervals until all identified deficiencies have been alleviated.**

The self-evaluation must be maintained on file and available for public inspection for three years. The self-evaluation file is available at the Human Resources Department.

CITY OF LAS VEGAS
AMERICANS WITH DISABILITIES ACT
SUMMARY OF SELF-EVALUATION
January 26, 1993

The Americans with Disabilities Act (ADA) mandated Self-Evaluation was written and directed by the ADA Program Administrator. A task force of representatives from all departments was trained on ADA including concepts, accessibility and the spirit of the law. Task force members provided training to department and division staff and coordinated completion of the Self-Evaluation checklists during October, 1992.

■ **ADMINISTRATION:** FEES, RISK MANAGEMENT, CONTRACTS FOR SERVICE, ASSIGNMENT OF EMPLOYEES, ADVISORY BOARDS, PROCEDURAL REQUIREMENTS, PERFORMANCE REVIEWS, UNDUE BURDEN

   1) **Are program fees charged to individuals with disabilities exactly the same as those fees for the same or similar programs or units of service charged to people without disabilities?**

      4% NO
      Recommended Action: None required as these programs are giving people with disabilities a reduced price.

   2) **Are contractors which provide programs or services to the general public in City facilities or areas required to sign a statement attesting to their intent to comply with the pertinent portion of the ADA?**

      11% NO
      Recommended Action: Require contractors which provide programs or services to sign a statement attesting to their intent to comply with the pertinent portion of the ADA.

   3) **Are contractors which bid on capital projects or for other contractual work with your department required to sign a statement attesting to their intent to comply with the pertinent portion of the ADA?**

      11% NO
      Recommended Action: Add a statement to all bid contracts attesting to the contractor's intent to comply with the pertinent portions of the ADA.

4) When your Department receives a complaint that a contractor which has provided a program or service to the public has discriminated on the basis of disability, is an investigation conducted?

>2% NO
>Recommended Action: Department Director shall establish a policy and procedure on handling any complaint that a contractor has discriminated on the basis of disability.

5) Are individuals with disabilities, when purchasing passes or similar services, given the option of establishing an appointment for their purchase?

>4% NO
>Recommended Action: Establish a means for people with disabilities to transact their business with the Department without having to stand in line, such as offering the option of an appointment.

6) Are qualified individuals with disabilities now serving on any advisory boards or committees which involve members of the community in the planning, conducting, or evaluation of Department services, programs, or activities?

>8% NO
>Recommended Action: Department and City Council make special effort to recruit qualified individuals with disabilities to serve on boards and committees.

7) Does the Department/Division purchasing officer make certain that requisitions, solicitations, and purchases of furniture, equipment or vehicles include specifications for a portion of the items being purchased to be readily accessible to and usable by people with disabilities?

>14% NO
>Recommended Action: All requisitions, solicitations and purchases of furniture, equipment or vehicles include specifications for a portion of the items being purchased to be readily accessible to and usable by people with disabilities.

8) Are employees with disabilities assigned to areas of work that utilize their expertise, and not on the basis of their disability?

>YES

9) **Has the department adopted a resolution of intent to comply with the ADA and made that resolution available to the general public?**

> 25% NO
> Recommended Action: Department adopt a policy of intent to comply with the ADA and make it available to their customers.

10) **Does the Department/Division include as a factor in the evaluation of the performance of all employees, the willingness of the employee to implement activities consistent with the requirements and intent of the ADA?**

> YES
> Recommended Action: The willingness of an employee to implement activities consistent with the requirements and intent of the ADA be considered in the information evaluation of his or performance.

11) **Does the Department Director sign off on the written description of why the Department will not make an accommodation which results in an undue burden, and is that writing made available to the individual with a disability that is adversely affected by that decision?**

> 15% NO
> Recommended Action: Department develop a policy and procedure for department director to sign off on the written description of why the Department will not make an accommodation and for notification to the individual with a disability who is adversely affected by that decision.

■ **COMMUNICATIONS:** TELEPHONES, BROCHURES, ANNUAL REPORTS & PUBLICATIONS, INVITATIONS TO BID, BOARD MINUTES, FREEDOM OF INFORMATION REQUESTS, INTEROFFICE MEMORANDA, CORRESPONDENCE

1) **Does the Department administration office have and use a telecommunications device for the deaf (TDD), or is some other method used to have effective communication by phone with residents who are hearing impaired?**

> 12% NO
> Recommended Action: Department develop a policy and procedure for responding to calls received on the City TDD and train staff to communicate via Relay Nevada with persons who use a TDD.

2) Are TDDs in place and used at sites, such as Municipal Court, where much of the contact with the public is by telephone?

12% NO
Recommended Action: Department develop a policy and procedure for responding to calls received on the City TDD and train staff to communicate via Relay Nevada with persons who use a TDD.

3) Is the City of Las Vegas TDD number on all printed material which has a telephone number?

28% NO
Recommended Action: Include the City of Las Vegas TDD number on all material which is printed with a telephone number.

4) Does the Department state in all program brochures and other official publications that a copy of the publication is available within 24 hours in an alternative format such as audio-tape or Braille for people with vision impairments?

54% NO
Recommended Action: State in all program brochures and other official publications that a copy of the publication is available in an alternative format upon request to 229-   (voice) or 386-9108 (TDD).

5) Does the Department have a written agreement with a non-profit or individual that will Braille department documents on notice of less than 48 hours?

52% NO
Recommended Action: Purchasing division negotiates with International Braille Services and either have a professional services contract or agree with them to accept City field purchase orders. When agreement is reached, notify all Divisions of the correct procedure.

6) Does the department have at least one certified sign language interpreter on retainer who is available to interpret on notice of less than 24 hours for important meetings, interviews and discussions?

59% NO
Recommended Action: Purchasing division negotiates with Deaf Resources and either have a professional services contract or agree with them to accept City field purchase orders. When agreement is reached, notify all Divisions of the correct procedure.

7) **Does the Department/Division have a list of providers of assistive listening systems, such as FM transmitter sets, that can be used for communication with people who have partial hearing loss?**

   45% NO
   <u>Recommended Action:</u> ADA Program Administrator develop a list of providers of assistive listening systems and devices and distribute to all divisions.

8) **Are minutes of meetings of board and any board committees available within 24 hours of the request in an alternative format for individuals with hearing or vision impairments?**

   2% NO
   <u>Recommended Action:</u> Department establish a policy and procedure to make minutes of meetings of boards and/or committees available within 24 hours of the request on audio-tape or in large print.

9) **Are fees for the filling of a request of a document in an alternative format the same as for the production of the requested document in its original form?**

   YES
   <u>Recommended Action:</u> Fees for a document in an alternative format MUST be the same as the fees for the production of the requested document in its original form.

10) **Are invitations to bid, job announcements, and required public notices, generated by the department, available in an alternative format to interested parties upon request?**

    18% NO
    <u>Recommended Action:</u> Department establish a policy and procedure to make invitations to bid and required public notices generated by the department available in an alternative format to interested persons upon request and include the following statement on the invitation or public notice: Available in alternative format upon request to 229- (Voice) or 386-9108 (TDD).

11) **When the Department/Division receives a communication in an alternative format, does it respond in that same format or in another equally effective method?**

    12% NO
    <u>Recommended Action:</u> Department develop a policy and procedure to ensure that if a communication is received in an alternative format, staff responds in that same format or in another equally effective method.

12) Does the Department/Division require attendance, by staff that is responsible for communication, at periodic training on the use of adaptive communications systems and appropriate methods of communication between staff and individuals with vision or hearing impairments?

> 39% NO
>
> Recommended Action: Training & Development Division of the Human Resources Department includes training on the use of adaptive communications systems and appropriate methods of communication between staff and individuals with vision or hearing impairments in their ADA related training components.

13) Is staff prepared to explain to callers which Department facilities are accessible and how the caller can obtain more information about accessible facilities and services?

> 26% NO
>
> Recommended Action: Department administrative secretary, or other designated person, provides receptionists with data on which department facilities are accessible and how the caller can obtain more information about accessible facilities and services.

14) Does the Department conduct periodic anonymous self-evaluative phone calls to audit employee's responses to requests for information, use of TDDs, and willingness to provide information in an adapted format?

> 46% NO
>
> Recommended Action: Division Chief, or other designated person, conduct periodic anonymous self-evaluation pone calls to audit employee's responses to requests from persons with disabilities.

15) Does the Department/Division make announcements on a bulletin board or marquee, and if so, does the Department/Division provide the same information in an accessible format (e.g., Braille, on tape, oral announcements) for people with vision impairments?

> 45% NO
>
> Recommended Action: Department and/or Division staff develop an equally effective way of furnishing bulleting board information relative to department programs and facilities to persons with vision impairments.

16) When Department/Division promotional flyers are distributed in school classrooms or other special settings, does the Department/Division identify classrooms or groups where individuals have vision impairments and distribute the information in an alternative format?

21% NO
Recommended Action: When making a presentation in school classrooms or other special settings, identify groups where individuals have vision impairments and provide the information in an alternative format.

17) Is the content of Department/Division documents and publications available in simple, easy-to-understand language for the learning-impaired?

29% NO
Recommended Action: To the extent possible, write department documents and publications in simple, easy-to-understand language.

■ **GOVERNANCE AND MEETINGS:** BOARD MEETING ANNOUNCEMENTS, PUBLIC COMMENT, AVAILABILITY OF AGENDA, LOCATIONS, CABLE BROADCASTS

1) Does the Department/Division provide posted notices of meeting dates, time and location in Braille and raised lettering, or in an alternative format?

4YES
Recommended Action: Department arrange for posted notices of board meetings to be available in an alternative format, if requested.

2) Does the announcement of meeting dates, times and locations invite those who require an accommodation to attend and participate in the meeting to call the Department and advise of this need 48 hours in advance?

38% NO
Recommended Action: Add this notice to all notices of board and committee meetings: *Visitors welcome. If you need an accommodation to attend and participate in this meeting, please call 229-   (voice) or 386-9108 (TDD) and advise of your need at least 48 hours in advance of the meeting.*

3) **Does the form used by visitors to a department/division meeting who wish to make a public comment include space where the visitor can request an auxiliary aid or service to assist with communication?**

> 3YES
> Recommended Action: Add these lines to the form for visitors to a public meeting who wish to make a public comment: *Do you need an auxiliary aid or service to assist with communication? Yes _____ No _____ If so, please describe _____.*

4) **Does the department/division have an agreement with a qualified sign language interpreter who can be present at the times of board meetings if a visitor to a meeting has requested an interpreter to a meeting?**

> 28% NO
> Recommended Action: Purchasing Division negotiates with Deaf Resources to provide sign language interpreters as needed either under a professional services contract or by using field purchase orders.

5) **Does the department/division have at least one agenda available for each meeting in either Braille or on audiocassette?**

> 28% NO
> Recommended Action: Department Director, or designee, make an audio-tape of the agenda for each meeting and have it available for anyone who can not read the printed agenda.

6) **Does the department/division plan each meeting of any board or committee to occur in a facility that is free of architectural barriers (unless the purpose of the meeting is to review accessibility features), or in the alternative upon notice of less than one your, can the meeting be moved to a location that is free of architectural barriers?**

> 2% NO
> Recommended Action: Schedule all meetings of boards and committees in facilities that are accessible, or have identified an alternative, accessible site to use upon notice of less than one hour, if a qualified individual with a disability requests that the meeting be accessible.

7) **When board or committee meetings are televised on cable television systems, does the department make certain that the telecast is closed captioned?**

> 1% NO
> Recommended Action: If a board or committee meeting is televised on cable television systems, make certain that the telecast is closed captioned.

8) **Does the department/division make certain that furniture to be used in a meeting at a department facility is usable by a person with a disability?**

> 15% NO
> Recommended Action: Division chief make certain any new furniture secured for use in a meeting area at a department facility is usable by a person with a disability.

9) **When department/division staff make plans for staff meetings with other professionals or members of the public, are visitors asked whether an accommodation such as a sign language interpreter or Brailled documents are required?**

> 39% NO
> Recommended Action: Whenever City staff hosts a meeting, ask other professionals or members of the public who will be attending if any accommodation such as a sign language interpreter or large print documents is required.

■ **TRAINING:** NEW EMPLOYEE ORIENTATION, REGULAR INSERVICE OPPORTUNITIES, PROFESSIONAL DEVELOPMENT AND CONTINUING EDUCATION, SEASONAL EMPLOYEE TRAINING, ELECTED OFFICIALS

1) **Are new department/division employees required to review and discuss the compliance requirements of the ADA for which the new employee has responsibility?**

> 28% NO
> Recommended Action: Division Chief, or designated person, include a review and discussion of the compliance requirements of the ADA in the division orientation of each new employee.

2) **Are new department/division employees required to attend workshops on the subject of creating the most integrated setting for users of department/division services, programs and facilities?**

> 41% NO
> Recommended Action: All employees receive training on creating the most integrated setting by the development and training division.

3) **Are new department/division employees who are responsible for communication equipment or communication with the public familiarized with department auxiliary aids and services or contractual resources?**

> 22% NO
>
> Recommended Action: Division chief, or designated person, include information about department auxiliary aids and services or contractual resources in the orientation of each new employee.

4) **Does the department/division provide, at least quarterly, inservice training for employees on subjects related to most integrated setting, removal of barriers, planning programs for accommodation, communication issues regarding people with disabilities, emergency evacuation of persons with disabilities and similar subjects?**

> 49% NO
>
> Recommended Action: Development and training division of human resources department include training in these areas as part of ADA related training components.

5) **Does the department/division schedule opportunities for individuals with disabilities who use department/division programs and facilities to provide evaluative feedback to staff regarding delivery of services and accessibility of facilities and grounds?**

> 41% NO
>
> Recommended Action: Department director and division chief develop and schedule opportunities for individuals who use division programs and facilities to provide evaluative feedback to staff regarding delivery of services and accessibility of facilities and grounds.

6) **Does the department/division authorize the expenditure of travel and training funds for learning experience related to individuals with disabilities, services for people with disabilities, or laws affecting services for people with disabilities?**

> 24% NO
>
> Recommended Action: When related to the department's scope of work, authorize travel and training expenditures to provide learning experiences related to individuals with disabilities, services for people with disabilities or laws affecting services for people with disabilities.

7) **Does the department/division require all seasonal employees to receive training regarding communication with people with disabilities, planning programs in the most integrated setting, and providing reasonable accommodations for people with disabilities?**

14% NO
Recommended Action: Division chief, or designated person, include training regarding communication with people with disabilities, planning programs in the most integrated setting and providing reasonable accommodations for people with disabilities in the training of all seasonal employees.

8) **Do department/division board members schedule orientations or participate in continuing education opportunities regarding services for people with disabilities, implementation of the ADA, and the compliance obligations of the department/division?**

24% NO
Recommended Action: Staff assigned to boards and committees share information received about the ADA and governmental services with the board or committee.

■ **PROGRAM PLANNING:** MOST INTEGRATED SETTING, PROVIDING AUXILIARY AIDS OR SERVICES, CHANGING RULES AND PROCEDURES, REMOVING ARCHITECTURAL BARRIERS, REMOVING TRANSPORTATION BARRIERS, STAFF TRAINING

1) **Does the department/division accept applications or registrations from qualified people with disabilities in all services, programs and activities conducted by, or on behalf of, the department/division?**

YES

2) **Does the department/division ask each registrant if any special accommodations are necessary for participation in department services, programs and activities?**

18% NO
Recommended Action: As a part of all registrations, provide an opportunity for each registrant to advise if a special accommodation is necessary for participation.

3) **Does the department/division provide seasonal training for program staff and volunteers on methods that may be used to maximize the interaction between registrants with disabilities and registrants without disabilities?**

15% NO
<u>Recommended Action:</u> Training and Development Division of Human Resources Department include training on methods that may be used to maximize the interaction between persons with disabilities and persons without disabilities in their ADA related training components and division chief provide the same training to all volunteers.

4) **Does the department/division offer segregated programs for people with disabilities that are similar in content to those available for people without disabilities but adapted to fit the abilities and requirements of registrants with disabilities who are not appropriate candidates for a conventional integrated setting?**

2% NO
<u>Recommended Action:</u> Division chief consider offering segregated programs for people with disabilities adapted to fit the abilities and requirements of registrants with disabilities who are not appropriate candidates for a conventional integrated setting.

5) **Does the department/division have established rules of appropriate conduct for all programs, services, and activities?**

11% NO
<u>Recommended Action:</u> Division chief, or designee, establish rules of appropriate conduct for all programs, services, and activities.

6) **Does the department/division post rules of conduct at facilities, on registration materials, and in program brochures and other similar publications?**

1YES
<u>Recommended Action:</u> Division chief post rules of conduct at each facility and include on registration materials and in program brochures.

7) **Are these rules of conduct enforced in every program and service by employees and volunteers of the department without regard to the presence of a disability?**

1YES
<u>Recommended Action:</u> Division chief develop a policy and procedure that rules of conduct are enforced in every program and service without regard to the presence of a disability.

8) Does the department/division have established goals and objectives for the activity in each program and service offered by the department/division, and is activity in each program consistent with these objectives?

4% NO

<u>Recommended Action:</u> Division chief establish goals and objectives for each program or activity and monitor activity in each program for consistency with the objectives.

9) Does the department/division provide services of a personal nature for program registrants, such as feeding, changing clothes, and toileting, as part of a registrant's participation in programs?

Only in the Adaptive Recreation Division.

10) Does the department/division permit a registrant with a disability to provide his or her own accommodations, such as a personal care attendant, with no charge to the individual with a disability for the presence of an attendant?

6% NO

<u>Recommended Action:</u> Permit a client with a disability to provide his or her own accommodations, such as a personal care attendant, with no charge to the individual with a disability for the presence of the attendant.

11) Does the department/division change procedures for registration when so requested by an individual with a disability, if doing so will enable that person to have access to the program, service, or activity?

YES

12) Does program staff change the rules of games or contests in programs to enable participation by registrants with disabilities to be as enjoyable as is participation by registrants without disabilities?

1% NO

<u>Recommended Action:</u> Division chief authorize program staff to change the rules of games or contests in programs to enable participation by registrants without disabilities.

13) Does the department/division provide, at no charge, auxiliary aids and services for program registrants with hearing, speech, or vision impairments that will enable their participation in department/division programs and services to be as effective as participation by people without those sensory impairments?

18% NO

Recommended Action: Department provide, without charge, requested auxiliary aid or service, or an equally effective accommodation; unless it would fundamentally change the nature of the service, program or activity or it would be an undue financial or administrative burden.

14) Does the department/division invite potential registrants who have a disability to contact the office two weeks in advance of the date programs begin to discuss any special accommodations or adaptations which are necessary for participation in department/division programs, activities and services?

22% NO

Recommended Action: Division invite potential registrants who have a disability to contact the office two weeks in advance of the date programs begin to discuss any special accommodations or adaptations which are necessary for participation.

15) Does the department/division evaluate the abilities and needs of each registrant, assigning additional staff and providing other accommodations as necessary?

19% NO

Recommended Action: Division chief develop a policy and procedure for evaluating a request for special accommodations or adaptations.

16) Does the department/division consider making home visits for individuals with disabilities who cannot leave home to attend a division program or secure a division service?

14% NO

Recommended Action: Division chief develop a policy and procedure for evaluating a request for a home visit for an individual with disabilities who cannot leave home to attend a division program or secure a division service.

17) When ordering materials and equipment for programs, do department/division staff order a portion that is designed for use by people with disabilities, or may be adapted for use by people with disabilities?

24% NO

Recommended Action: Division chief establish a policy that a portion of all materials and equipment ordered/purchased for division programs is designed for use by people with disabilities or may be adapted for use by people with disabilities.

18) Have department/division staff identified facilities which are free of architectural barriers and may house programs, services and activities when a registrant with a disability if eligible for participation in a program or service planned for a facility which is not accessible?

11% NO

Recommended Action: Schedule all services, programs and activities in facilities that are accessible.

19) Does language in program brochures indicate that the department/division will comply with the ADA by making reasonable accommodations for people with disabilities that will enable their enjoyment of programs and facilities operated by the department?

19% NO

Recommended Action: Department director or designee review language in brochures to make certain it indicates that the department will comply with the ADA by making reasonable accommodations for people with disabilities.

20) Are individuals with disabilities portrayed in department/division documents, publications and audio-visual presentations?

14% NO

Recommended Action: At least 10% of all individuals portrayed in documents, publications and audio-visual presentations be identifiable as persons with disabilities.

21) When the department/division offers segregated programs for people with disabilities, does the language in the program brochure state any relative skills required as a condition of participation, or is the segregated program instead available for all people?

> 1% NO
> Recommended Action: Division chief and information specialist include in the program brochure any relative skills required as a condition of participation in segregated programs for people with disabilities.

22) Does the department/division, if it conducts segregated programs, compare its conventional programs to those offered as segregated programs to make certain that people with disabilities have the same number of opportunities and may participate in the same type of activities?

> 1% NO
> Recommended Action: Division chief and program staff compare segregated programs to conventional programs offered by the department and make certain that people with disabilities have the same number of opportunities and may participate in the same type of activities.

23) Does the department/division, it if allows the use of its facilities by other organizations, require those organizations to sign a statement of intent to comply with the ADA and to not discriminate on the basis of disability while using City facilities?

> 16% NO
> Recommended Action: Department director require other organizations using department facilities to sign a statement of intent to comply with the ADA and to not discriminate on the basis of disability while using City facilities.

■ **TRANSPORTATION:** DEMAND RESPONSIVE SYSTEMS, ACQUISITION OF NEW VEHICLES, EQUIVALENT SERVICE, TRANSPORTATION BARRIERS

1) Does the department/division own or use passenger vehicles (cars, vans, or buses) for the transportation of registrants to and from a location for the purpose of participation in services, programs or activities offered or conducted by, or on behalf of, the department?

> Four (4) departments own or use passenger vehicles for the transportation of program participants.

2) **Does the department/division own, use or acquire a vehicle which will seat individuals who use wheelchairs for the type of transportation described in #1 above?**

   5YES
   Recommended Action: Division chief develop policy and procedure for providing transportation when a program participant uses a wheelchair or has a disability which prevents him or her from boarding a standard passenger vehicle.

3) **Do any vehicles used by the department/division for the purpose described in #1 above include, at the minimum, the following accessibility and safety features: extended doorway, wheelchair lift, tie-downs for two wheelchairs, seatbelts for individuals using wheelchairs, raised roof, and a backing alarm?**

   5YES
   Recommended Action: Any new vehicle purchased meet ADA guidelines.

4) **Does the department/division charge a person with a disability the same fee for use of transportation as described in #1 above, as the fee charged to people without disabilities who use the service?**

   YES

5) **Does the department/division include in solicitations for the purchase or lease of vehicles which will be used for the purpose described in #1 above, as the fee charged to people without disabilities who use the service?**

   YES

6) **Do any barriers exist which are caused solely by the impact of the disability of the individual on that person's ability to acquire a driver's license or to physically perform the tasks required to drive an auto?**

   YES

7) **Do any barriers exist which are caused solely by the impact of the disability of the individual on that person's ability to understand the rules of the road and to become aware of where that person is driving?**

   YES

8) Does the department/division provide home visits conducted by staff for the purpose of delivering services, programs or activities, when necessary due to a transportation barrier related solely to disability?

18% NO

Recommended Action: Division chief develop a policy and procedure for evaluating a request for home visits by a person with disabilities who cannot leave home due to a transportation barrier related solely to disability.

9) Does the department/division have an agreement with the local mass transit provider or private cab or van transportation service for the transportation of people with disabilities to and from department/division programs?

4% NO

Recommended Action: Department director and/or division chiefs communicate with CAT to facilitate transportation for people with disabilities to and from department/division programs.

■ **EMERGENCY EVACUATION:**

1) Does the facility where the program, activity or service being evaluated is conducted have an emergency evacuation plan?

1YES

Recommended Action: Each facility, in cooperation with risk management division, develop an emergency evacuation plan.

2) Is the emergency evacuation plan and evacuation route available in large print and Braille?

68% NO

Recommended Action: Division chief have evacuation route posted in each facility in large print and make emergency evacuation plan available to staff in alternative formats, if requested.

■ **VOLUNTEERS:** RECRUITMENT, SELECTION, RECOGNITION, JOB ASSIGNMENTS

1) **When an individual applies to be a volunteer, are they only asked if they are able to perform job-related functions and not asked about the nature or severity of any disability?**

   4% NO
   Recommended Action: Use new volunteer application which does not ask about the nature or severity of any disability.

2) **Are all volunteers required to have a medical examination regardless of disability prior to reporting for duty and is the offer of volunteer service conditioned on the results of that examination?**

   3YES
   Recommended Action: Use new volunteer application which only asks if the individual has any disability which would prevent him or her from performing job-related functions.

3) **Does the division keep information obtained on the medical condition or history of a volunteer on separate forms that are afforded confidentiality as medical records?**

   9% NO
   Recommended Action: Division chief maintain a confidential file for information obtained on the medical condition or history of a volunteer.

4) **Are volunteer job descriptions written in terms of job-related functions?**

   21% NO
   Recommended Action: Division chief, or designee, rewrite volunteer job descriptions in terms of essential functions.

5) **Is department/division volunteer recognition based on criteria that do not discriminate against a person with a disability?**

   YES

6) **Are volunteers with disabilities assigned to areas of work that utilize their expertise, and not on the basis of their disability?**

   YES

- **PLAYGROUNDS & PARKS:** PLAYGROUND APPROACH, PLAYGROUND ENTRANCE, PLAYGROUND USE, PLAYGROUND STRUCTURES, MODIFICATIONS TO FIXED EQUIPMENT, PATHWAYS

    1) **For every ten distinct play areas, whether on a structure of in another area of the playground, are at least three on a plan with a slope not exceeding 1" to 12" and easily reached for use from the playground path of travel?**

        10YES
        Recommended Action: Whenever a play area is renovated, make 30% of the distinct play areas accessible to children with disabilities.

    2) **For every ten distinct play areas, whether on a structure of in another area of the playground, are at least three (in addition to the three referenced in #1 above) reachable and usable with slight difficulty from the playground path of travel or from a portion of the playground equipment?**

        10YES
        Recommended Action: Whenever a play area is renovated, make an additional 30% of the play areas accessible with slight difficulty.

    3) **Are play areas within the playground designed to encourage interaction between children with and without disabilities?**

        10YES
        Recommended Action: Whenever a play area is renovated, design it to encourage interaction between children with and without disabilities.

    4) **Are the sensations and activities (such as swinging, spinning, climbing, rolling, manipulating, sliding, and others) available for experience by a child without a disability who uses the play areas or equipment within the playground, also available for a child with a disability using areas or equipment in the playground?**

        10YES
        Recommended Action: Whenever a play area is renovated, require that the same sensations and activities are available for experience by a child with a disability as are available for a child without a disability using the area or equipment.

5) **Can existing structures or sensations be modified for use by a child with a disability, and if so, has the department/division made or acquired such modifications?**

> 10YES
>
> <u>Recommended Action:</u> Division chief work with playground equipment manufacturers to determine if some of the existing structures or sensations can be modified for use by a child with a disability without having to do a complete renovation of the play area.

6) **Is playground resilient surfacing a material which permits unassisted, unimpeded travel by a person in a wheelchair?**

> 10YES
>
> <u>Recommended Action:</u> Provide resilient surfacing as part of all playground renovations and request capital improvement funds to provide accessible routes of travel in playground areas.

7) **When a playground is not readily accessible to and usable by a person with a disability, is another playground nearby accessible.**

> 10YES
>
> <u>Recommended Action:</u> Division chief develop a plan to renovate selected playgrounds dispersed throughout the city and make them readily accessible to and usable by a child with a disability.

8) **Does the park have signage which informs a visitor as to whether the park is accessible to and usable by people with disabilities?**

> 10YES
>
> <u>Recommended Action:</u> Department director incorporate accessibility signage into the new park information signs.

9) **If the park has an entrance which is not accessible, does the signage at the entrance indicate the location of an accessible entrance to the park, or if there is not such an entrance, a location the visitor can go for information about parks that are accessible?**

> 10YES
>
> <u>Recommended Action:</u> Department director incorporate accessibility signage into the new park information signs.

10) Are use areas, spectator areas, concessions, and passive areas designed to maximize interaction between people without disabilities and people with disabilities?

10YES

<u>Recommended Action:</u> Whenever a park is renovated, place high emphasis on design for maximum interaction between people without disabilities and people with disabilities.

11) Does the department/division modify existing use areas for use by people with disabilities, or are rules or policies changed to enable use by people with disabilities?

YES